

**Fill in this information to identify the case:**

Debtor 1 Roberta Lyn Hoy

Debtor 2  
(Spouse, if filing)United States Bankruptcy Court for the: Middle District of PACase number 19-05263 HWV**Form 4100R****Response to Notice of Final Cure Payment**

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

**Part 1: Mortgage Information**

Name of Creditor: MIDFIRST BANK

Court claim no. (if known): 5-1

Last 4 digits of any number you use to identify the debtor's account: 0569

Property address:

154 Needlewood Drive, Unit D4  
Harrisburg, PA 17112**Part 2: Prepetition Default Payments**

Check one:

☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_**Part 3: Postpetition Mortgage Payment**

Check one:

☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 02 / 01 / 2025

☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due: (a) \$ \_\_\_\_\_

b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ \_\_\_\_\_

c. **Total.** Add lines a and b. (c) \$ \_\_\_\_\_

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

Debtor(s) Roberta Lyn Hoy  
First Name Middle Name

Last Name

Case Number (if known): 19-05263 HWV

#### Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

#### Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.  
☒ I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

x/s/ Brent J. Lemon  
Brent Lemon  
27 Jan 2025, 14:46:21, EST

Date 01/27/2025

KML Law Group, P.C.  
701 Market Street, Suite 5000  
Philadelphia, PA 16106  
215-627-1322  
[bkgroup@kmlawgroup.com](mailto:bkgroup@kmlawgroup.com)  
Attorney for Creditor

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

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**IN RE: Roberta Lyn Hoy**

**Debtor(s)**

**BK NO. 19-05263 HWV**

**Chapter 13**

**MIDFIRST BANK**

**Movant**

**Related to Claim No. 5-1**

**vs.**

**Roberta Lyn Hoy**

**Debtor(s)**

**Jack N. Zaharopoulos,**

**Trustee**

**CERTIFICATE OF SERVICE**

**RESPONSE TO NOTICE OF FINAL CURE MORTGAGE PAYMENT**

I, Brent J. Lemon of KML Law Group, P.C., certify that I am, and at all times hereinafter mentioned was, more than 18 years of age and that on January 28, 2025, I served the above captioned pleading, filed in the proceeding on the parties at the addresses shown below:

Debtor(s)

Roberta Lyn Hoy  
154 Needlewood Drive, Unit D4  
Harrisburg, PA 17112

Attorney for Debtor(s) (via ECF)

Paul Donald Murphy-Ahles  
Dethlefs Pykosh & Murphy  
2132 Market Street  
Camp Hill, PA 17011

Trustee (via ECF)

Jack N. Zaharopoulos  
8125 Adams Drive  
Hummelstown, PA 17036

Method of Service: electronic means or first-class mail

Dated: January 28, 2025

**/s/ Brent J. Lemon**

Brent J. Lemon  
Attorney I.D. 86478  
KML Law Group, P.C.  
BNY Mellon Independence Center  
701 Market Street, Suite 5000  
Philadelphia, PA 19106  
(412) 475-8764  
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